

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

**VOICE SIGNAL TECHNOLOGIES, INC.'S  
MOTION FOR IMPOUNDMENT OF OPPOSITION**

Defendant and counterclaim plaintiff Voice Signal Technologies, Inc. (“Voice Signal”) moves pursuant to Local Rule 7.2 and section 14 of the parties’ agreed-to Protective Order for an order impounding its Opposition to ScanSoft, Inc.’s Motion to Compel Deposition of Choate, Hall & Stewart Attorney Regarding Violation of Protective Order (the “Opposition”), filed concurrently by hand.

As grounds for this motion, Voice Signal states that its Opposition cites to the transcript of the December 9, 2004 deposition of Voice Signal’s Chief Technology Officer, Jordan Cohen. Pursuant to section 3(d) of the Protective Order, which was filed with the Court on June 18, 2004, but has not yet been entered, deposition testimony is to be treated as “highly confidential” for fifteen days after the transcript is received from the stenographer. Section 14 of the Protective Order provides that highly confidential materials are to be filed with the Court under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding the Opposition. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file the Opposition under seal concurrently with this motion for impoundment.

Respectfully submitted,

Dated: December 29, 2004

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Paul E. Bonanno

Robert S. Frank, Jr. (BBO No. 177240)  
Sarah Chapin Columbia (BBO No. 550155)  
Paul D. Popeo (BBO No. 567727)  
Paul E. Bonanno (BBO No. 646838)  
CHOATE, HALL & STEWART  
Exchange Place  
53 State Street  
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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on December 29, 2004 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Paul E. Bonanno

Paul E. Bonanno

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